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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 13-0554 JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
v.)	
)	Date: February 14, 2014
GUILLERMO ESPARZA,)	Time: 9:30 a.m.
)	
Defendant.)	

The above-captioned matter is set on February 14, 2014 at 9:30 a.m. before this Court for a status appearance. The parties have actively been in plea negotiations and have reached a tentative plea agreement; however, defense counsel needs additional time to meet with Defendant to go over the draft plea agreement. For this reason, the parties request that this Court continue the status hearing and set a change of plea date to March 21, 2014 at 9:30 a.m.

The Court has previously excluded the running of the speedy trial clock for effective preparation of counsel, 18 U.S.C. 3161(h)(7)(B)(iv), through February 14, 2014. Therefore, the parties now request that the time between February 14, 2014 and March 21, 2014 be excluded from the running of the speedy trial clock for effective preparation of counsel, 18 U.S.C. 3161(h)(7)(B)(iv). The parties agree

1 that, taking into account the public interest in prompt disposition of criminal cases, good cause exists for
2 this extension due to the anticipated plea agreement and defense counsel's need to discuss it and advise
3 her client. The parties also agree that the ends of justice served by granting such a continuance
4 outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. 3161(h)(7)(A).

5 SO STIPULATED:

6 MELINDA HAAG
7 United States Attorney

8
9 DATED: February 10, 2014

10 /S/
11 NATALIE LEE
12 Assistant United States Attorney

13 DATED: February 10, 2014

14 /S/
15 ELLEN LEONIDA
16 Attorney for Guillermo Esparza

17 For the reasons stated above, this matter is continued until March 21, 2014, for a change of plea,.
18 The Court finds that the exclusion of time from February 14, 2014 through March 21, 2014 is warranted
19 and that the ends of justice served by the continuance outweigh the best interests of the public and the
20 defendants in a speedy trial. 18 U.S.C. 3161 (h)(7)(A). The failure to grant the requested continuance
21 would deny the defendant effective preparation of counsel and continuity of counsel. 18 U.S.C.
22 3161(h)(7)(B)(iv).

23 SO ORDERED.

24 DATED: February 11, 2014

25 
26 HONORABLE JON S. TIGAR
27 United States District Judge